

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WESTERN DIGITAL TECHNOLOGIES,)	
INC.,)	
)	Case No. 17-cv-02575
Plaintiff,)	
)	
v.)	
)	
THE PARTNERSHIPS and)	
UNINCORPORATED ASSOCIATIONS)	
IDENTIFIED ON SCHEDULE "A,")	
)	
Defendants.)	
)	

PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff Western Digital Technologies, Inc. (“Western Digital” or “Plaintiff”) files this Motion requesting leave to file the following documents under seal: (1) Plaintiff’s Amended Complaint which identifies the Online Marketplace Accounts; (2) Schedule A attached to the Complaint and the Amended Complaint, which includes a list of the Online Marketplace Accounts; and (3) screenshot printouts showing the active Defendant Internet Stores (Exhibit 2 to the Declaration of Cynthia Tregillis). In this action, Western Digital is requesting temporary *ex parte* relief based on an action for trademark infringement and counterfeiting, false designation of origin, and violation of the Illinois Uniform Deceptive Trade Practices Act.

Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court’s power to

grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Western Digital will move to unseal these documents.

Dated this 4th day of April 2017.

Respectfully submitted,

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